

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY ONE CONGRESS STREET, SUITE 1100 BOSTON, MA 02114-2023

July 6, 2006

Mr. Andrew Silfer Corporate Environmental Programs General Electric Company 159 Plastics Avenue Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's August 30, 2005 GMA 1 NAPL Monitoring Report for Spring 2005 and February 27, 2006 GMA 1 NAPL Monitoring Report for Fall 2005, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's August 30, 2005 GMA 1 NAPL Monitoring Report for Spring 2005 and February 27, 2006 GMA 1 NAPL Monitoring Report for Fall 2005. This letter is subject to the terms and conditions specified in the Consent Decree that was entered in U.S. District Court on October 27, 2000.

Pursuant to Paragraph 73 of the Consent Decree, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the August 30, 2005 and February 27, 2006 reports, subject to the following conditions:

- 1. GE shall abandon only the following 20 wells located on parcel I9-8-1 (Lyman Street Parking Lot): LS-02, LS-04, LS-10, LS-11, LS-20, LS-22, LS-23, LS-25, LS-32, LS-33, LS-35, LS-36, LS-37, LS-41, LSSC-02, LSSC-03, LSSC-04, LSSC-10, LSSC-19, and RW-1. EPA will make decisions on abandoning wells on other parcels at a later date when soil removal activities are completed and when the GMA 1 long-term groundwater monitoring program is approved.
- 2. GE shall conduct a NAPL bail down test at GMA-1 well 25R, where sustainable LNAPL thicknesses of greater than 1 foot have been observed to determine if this well would be suitable for automated LNAPL recovery systems. GE shall submit the bail down test results and, if appropriate based on these result, a proposal for the installation

of an automated LNAPL recovery system, in the next regularly-scheduled GMA1 NAPL Monitoring Report.

- 3. GE shall replace existing 0.75-inch diameter wells with 4-inch diameter wells at locations 95-4 and 95-7 and monitor LNAPL thickness monthly for six months. If the LNAPL thickness remains above 1 foot, GE shall then conduct NAPL bail down tests at these wells to determine if they would be suitable for automated LNAPL recovery systems. GE shall submit the bail down test results and, if appropriate based on these results, a proposal for the installation of an automated LNAPL recovery system, in the next regularly-scheduled GMA1 NAPL Monitoring Report.
- 4. Prior to the submittal of the next regularly-scheduled GMA 1 NAPL Monitoring Report, GE shall inspect the Lyman Street and Oxbow B riverbank for NAPL seeps and revise the riverbank NAPL inspection forms and map to specify the extent of the riverbank areas inspected.

EPA reserves its right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the CD.

If you have any questions, please contact me at (617) 918-1328.

Sincerely,

Sharon M. Hayes CE Facility Project Manager

cc:

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